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9 IN THE JUSTICE COURT OF RENO TOWNSHIP
10 IN AND FOR WASHOE COUNTY, STATE OF NEVADA

11 STATE OF NEVADA,

12 Plaintiff,

13 vs.

14 STEPHEN ALLEN KROMER,

15 Defendant.

Case No.

Dept. No.

16 **CRIMINAL COMPLAINT**

17 The undersigned, AARON D. FORD, ESQ. Attorney General for the State of Nevada, by and
18 through MELISSA ROSENTHAL, ESQ., Senior Deputy Attorney General, and PETER W. SMITH,
19 ESQ., Senior Deputy Attorney General complains and charges the above-named defendant, STEPHEN
20 ALLEN KROMER, with having committed the crimes of one (1) count of THEFT IN AN AMOUNT OF
21 \$25,000 OR MORE BUT LESS THAN \$100,000, a category "B" felony in violation of NRS 205.0832
22 and NRS 205.0835(2)(d), NOC [61961]; and thirty (30) counts of THEFT IN AN AMOUNT GREATER
23 THAN \$100,000, category "B" felonies in violation of NRS 205.0832 and NRS 205.0835(2)(e), NOC
24 [61963]. All of the acts alleged herein have been committed on or about and between August 26, 2024 to
25 November 29, 2024, by the above-named Defendant, within Washoe County, State of Nevada, in the
26 following manner:

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1 **COUNT I**

2 **THEFT IN AN AMOUNT OF \$25,000 OR MORE, BUT LESS THAN \$100,000**
3 **Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(d)**
4 **NOC 61961**

5 That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly
6 controlled property of another person with the intent to deprive that person of the property, and/or
7 converted, made an unauthorized transfer of an interest in, or without authorization controlled any property
8 of another person, or used the services or property of another person entrusted to him or placed in his
9 possession for a limited, authorized period of determined or prescribed duration or for a limited use, with
10 said property valued at \$25,000 or more, but less than \$100,000, to wit: on or about September 4, 2024,
11 Defendant, having been entrusted with monies from the Nevada Department of Transportation, knowingly
12 controlled said monies with the intent to deprive, or converted and/or made an unauthorized transfer of
13 monies in the amount of approximately \$50,000 from a First Independent Bank Account ending x1729 to a
14 Bank of America Account ending x2206 for his personal gain and/or use, some or all of which occurred in
15 Washoe County, State of Nevada.

16 **COUNT II**

17 **THEFT IN AN AMOUNT GREATER THAN \$100,000**
18 **Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)**
19 **NOC 61963**

20 That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly
21 controlled property of another person with the intent to deprive that person of the property, and/or
22 converted, made an unauthorized transfer of an interest in, or without authorization controlled any property
23 of another person, or used the services or property of another person entrusted to him or placed in his
24 possession for a limited, authorized period of determined or prescribed duration or for a limited use, with
25 said property valued more than \$100,000, to wit: on or about August 26, 2024, Defendant, having been
26 entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies
27 with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of
28 approximately \$268,706.94 from a First Independent Bank Account ending x1729 to a Bank of America
Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County,
State of Nevada.

1 **COUNT VII**

2 **THEFT IN AN AMOUNT GREATER THAN \$100,000**
3 **Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)**
4 **NOC 61963**

5 That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly
6 controlled property of another person with the intent to deprive that person of the property, and/or
7 converted, made an unauthorized transfer of an interest in, or without authorization controlled any property
8 of another person, or used the services or property of another person entrusted to him or placed in his
9 possession for a limited, authorized period of determined or prescribed duration or for a limited use, with
10 said property valued more than \$100,000, to wit: on or about September 9, 2024, Defendant, having been
11 entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies
12 with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of
13 approximately \$305,000.00 from a First Independent Bank Account ending x1729 to a Bank of America
14 Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County,
15 State of Nevada.

16 **COUNT VIII**

17 **THEFT IN AN AMOUNT GREATER THAN \$100,000**
18 **Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)**
19 **NOC 61963**

20 That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly
21 controlled property of another person with the intent to deprive that person of the property, and/or
22 converted, made an unauthorized transfer of an interest in, or without authorization controlled any property
23 of another person, or used the services or property of another person entrusted to him or placed in his
24 possession for a limited, authorized period of determined or prescribed duration or for a limited use, with
25 said property valued more than \$100,000, to wit: on or about September 12, 2024, Defendant, having been
26 entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies
27 with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of
28 approximately \$305,694.00 from a First Independent Bank Account ending x1729 to a Bank of America
Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County,
State of Nevada.

1 **COUNT IX**

2 **THEFT IN AN AMOUNT GREATER THAN \$100,000**
3 **Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)**
4 **NOC 61963**

5 That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly
6 controlled property of another person with the intent to deprive that person of the property, and/or
7 converted, made an unauthorized transfer of an interest in, or without authorization controlled any property
8 of another person, or used the services or property of another person entrusted to him or placed in his
9 possession for a limited, authorized period of determined or prescribed duration or for a limited use, with
10 said property valued more than \$100,000, to wit: on or about September 16, 2024, Defendant, having been
11 entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies
12 with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of
13 approximately \$205,000.00 from a First Independent Bank Account ending x1729 to a Bank of America
14 Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County,
15 State of Nevada.

16 **COUNT X**

17 **THEFT IN AN AMOUNT GREATER THAN \$100,000**
18 **Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)**
19 **NOC 61963**

20 That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly
21 controlled property of another person with the intent to deprive that person of the property, and/or
22 converted, made an unauthorized transfer of an interest in, or without authorization controlled any property
23 of another person, or used the services or property of another person entrusted to him or placed in his
24 possession for a limited, authorized period of determined or prescribed duration or for a limited use, with
25 said property valued more than \$100,000, to wit: on or about September 24, 2024, Defendant, having been
26 entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies
27 with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of
28 approximately \$205,000.00 from a First Independent Bank Account ending x1729 to a Bank of America
Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County,
State of Nevada.

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COUNT XI

**THEFT IN AN AMOUNT GREATER THAN \$100,000
Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)
NOC 61963**

That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly controlled property of another person with the intent to deprive that person of the property, and/or converted, made an unauthorized transfer of an interest in, or without authorization controlled any property of another person, or used the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or prescribed duration or for a limited use, with said property valued more than \$100,000, to wit: on or about September 30, 2024, Defendant, having been entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of approximately \$350,000.00 from a First Independent Bank Account ending x1729 to a Bank of America Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County, State of Nevada.

COUNT XII

**THEFT IN AN AMOUNT GREATER THAN \$100,000
Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)
NOC 61963**

That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly controlled property of another person with the intent to deprive that person of the property, and/or converted, made an unauthorized transfer of an interest in, or without authorization controlled any property of another person, or used the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or prescribed duration or for a limited use, with said property valued more than \$100,000, to wit: on or about October 9, 2024, Defendant, having been entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of approximately \$210,000.00 from a First Independent Bank Account ending x1729 to a Bank of America Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County, State of Nevada.

1 **COUNT XIII**

2 **THEFT IN AN AMOUNT GREATER THAN \$100,000**
3 **Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)**
4 **NOC 61963**

5 That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly
6 controlled property of another person with the intent to deprive that person of the property, and/or
7 converted, made an unauthorized transfer of an interest in, or without authorization controlled any property
8 of another person, or used the services or property of another person entrusted to him or placed in his
9 possession for a limited, authorized period of determined or prescribed duration or for a limited use, with
10 said property valued more than \$100,000, to wit: on or about October 10, 2024, Defendant, having been
11 entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies
12 with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of
13 approximately \$250,000.00 from a First Independent Bank Account ending x1729 to a Bank of America
14 Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County,
15 State of Nevada.

16 **COUNT XIV**

17 **THEFT IN AN AMOUNT GREATER THAN \$100,000**
18 **Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)**
19 **NOC 61963**

20 That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly
21 controlled property of another person with the intent to deprive that person of the property, and/or
22 converted, made an unauthorized transfer of an interest in, or without authorization controlled any property
23 of another person, or used the services or property of another person entrusted to him or placed in his
24 possession for a limited, authorized period of determined or prescribed duration or for a limited use, with
25 said property valued more than \$100,000, to wit: on or about October 11, 2024, Defendant, having been
26 entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies
27 with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of
28 approximately \$250,000.00 from a First Independent Bank Account ending x1729 to a Bank of America
Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County,
State of Nevada.

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COUNT XVII

**THEFT IN AN AMOUNT GREATER THAN \$100,000
Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)
NOC 61963**

That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly controlled property of another person with the intent to deprive that person of the property, and/or converted, made an unauthorized transfer of an interest in, or without authorization controlled any property of another person, or used the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or prescribed duration or for a limited use, with said property valued more than \$100,000, to wit: on or about October 21, 2024, Defendant, having been entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of approximately \$185,000.00 from a First Independent Bank Account ending x1729 to a Bank of America Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County, State of Nevada.

COUNT XVIII

**THEFT IN AN AMOUNT GREATER THAN \$100,000
Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)
NOC 61963**

That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly controlled property of another person with the intent to deprive that person of the property, and/or converted, made an unauthorized transfer of an interest in, or without authorization controlled any property of another person, or used the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or prescribed duration or for a limited use, with said property valued more than \$100,000, to wit: on or about October 25, 2024, Defendant, having been entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of approximately \$225,515.00 from a First Independent Bank Account ending x1729 to a Bank of America Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County, State of Nevada.

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COUNT XXI

**THEFT IN AN AMOUNT GREATER THAN \$100,000
Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)
NOC 61963**

That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly controlled property of another person with the intent to deprive that person of the property, and/or converted, made an unauthorized transfer of an interest in, or without authorization controlled any property of another person, or used the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or prescribed duration or for a limited use, with said property valued more than \$100,000, to wit: on or about October 30, 2024, Defendant, having been entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of approximately \$225,000.00 from a First Independent Bank Account ending x1729 to a Bank of America Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County, State, of Nevada.

COUNT XXII

**THEFT IN AN AMOUNT GREATER THAN \$100,000
Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)
NOC 61963**

That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly controlled property of another person with the intent to deprive that person of the property, and/or converted, made an unauthorized transfer of an interest in, or without authorization controlled any property of another person, or used the services or property of another person entrusted to him or placed in his possession for a limited, authorized period of determined or prescribed duration or for a limited use, with said property valued more than \$100,000, to wit: on or about November 6, 2024, Defendant, having been entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of approximately \$255,000.00 from a First Independent Bank Account ending x1729 to a Bank of America Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County, State of Nevada.

1 **COUNT XXV**

2 **THEFT IN AN AMOUNT GREATER THAN \$100,000**
3 **Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)**
4 **NOC 61963**

5 That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly
6 controlled property of another person with the intent to deprive that person of the property, and/or
7 converted, made an unauthorized transfer of an interest in, or without authorization controlled any property
8 of another person, or used the services or property of another person entrusted to him or placed in his
9 possession for a limited, authorized period of determined or prescribed duration or for a limited use, with
10 said property valued more than \$100,000, to wit: on or about November 15, 2024, Defendant, having been
11 entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies
12 with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of
13 approximately \$235,000.00 from a First Independent Bank Account ending x1729 to a Bank of America
14 Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County,
15 State of Nevada.

16 **COUNT XXVI**

17 **THEFT IN AN AMOUNT GREATER THAN \$100,000**
18 **Category "B" Felony - NRS 205.0832; NRS 205.0835(2)(e)**
19 **NOC 61963**

20 That the Defendant, STEPHEN ALLEN KROMER, without lawful authority, knowingly
21 controlled property of another person with the intent to deprive that person of the property, and/or
22 converted, made an unauthorized transfer of an interest in, or without authorization controlled any property
23 of another person, or used the services or property of another person entrusted to him or placed in his
24 possession for a limited, authorized period of determined or prescribed duration or for a limited use, with
25 said property valued more than \$100,000, to wit: on or about November 18, 2024, Defendant, having been
26 entrusted with monies from the Nevada Department of Transportation, knowingly controlled said monies
27 with the intent to deprive, or converted and/or made an unauthorized transfer of monies in the amount of
28 approximately \$240,000.00 from a First Independent Bank Account ending x1729 to a Bank of America
Account ending x2206 for his personal gain and/or use, some or all of which occurred in Washoe County,
State of Nevada.